## **EXHIBIT C**

## Manuel J. Rios, Jr.

From: Katherine E. Charonko

**Sent:** Wednesday, May 5, 2021 12:18 PM

To: Steinmetz, Kyle J.; John W. Barrett; Manuel J. Rios, Jr.; Germann, Hans; Parasharami,

Archis A.; Jones, Daniel E.; 'dwaltz@jacksonkelly.com';

'sarah.a.phipps@jacksonkelly.com'

**Cc:** Benjamin J. Hogan; William S. Flynn; 'Anthony Paronich'; Ted Broderick; Matthew

McCue

**Subject:** RE: Diana Mey, et al v. DirecTV - Case No. 5:17-CV-00179-JPB

**Attachments:** Plaintiffs' Proposed ESI Search Terms.pdf

Klye,

Please see attached Plaintiffs' Proposed ESI Search Terms. Without knowing the type of system being utilized for searches and collections, we have left the searches as independent phrases as opposed to circulating the searches in a list format. We can revise the searches to comport with your search systems as needed following our call this afternoon.

Thanks, Kate

Katherine E. Charonko Bailey & Glasser LLP T: 304.345.6555

From: Steinmetz, Kyle J. <KSteinmetz@mayerbrown.com>

Sent: Thursday, April 29, 2021 2:38 PM

**To:** Katherine E. Charonko <kcharonko@baileyglasser.com>; John W. Barrett <JBarrett@baileyglasser.com>; Manuel J. Rios, Jr. <mrios@baileyglasser.com>; Germann, Hans <HGermann@mayerbrown.com>; Parasharami, Archis A. <AParasharami@mayerbrown.com>; Jones, Daniel E. <DJones@mayerbrown.com>; 'dwaltz@jacksonkelly.com' <dwaltz@jacksonkelly.com>; 'sarah.a.phipps@jacksonkelly.com>

<anthony@paronichlaw.com>; Ted Broderick <Ted@broderick-law.com>; Matthew McCue

<mmccue@massattorneys.net>

Subject: RE: Diana Mey, et al v. DirecTV - Case No. 5:17-CV-00179-JPB

## **CAUTION: External Email**

That's fine.

Thanks

Kyle